
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Hon. Leda Dunn Wettre
 :
 KEVIN CORDEIRO : Mag. No. 21-13102
 :

I, Cyril Pereira, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and that this complaint is based on the following facts:

SEE ATTACHMENT B

Cyril Pereira
Cyril Pereira, Special Agent
Bureau of Alcohol, Tobacco, Firearms & Explosives

Special Agent Pereira attested to this Complaint
by telephone pursuant to F.R.C.P. 4.1(b)(2)(A)

March 17, 2021
Date

at District of New Jersey
County and State

HONORABLE LEDA DUNN WETTRE
UNITED STATES MAGISTRATE JUDGE

Hon. Leda Dunn Wettre
Signature of Judicial Officer

ATTACHMENT A

COUNT ONE

(Possession of Ammunition by a Convicted Felon)

On or about February 27, 2021, in Union County, in the District of New Jersey and elsewhere, the defendant,

KEVIN CORDEIRO,

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce at least eight (8) rounds of .45 caliber ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

ATTACHMENT B

I, Cyril Pereira, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about February 27, 2021, at approximately 10:51 a.m., law enforcement responded to a report that shots were fired on Westfield Avenue in Elizabeth, New Jersey.

2. Video footage captured the shooting and the events that followed from multiple vantage points, which collectively depicts the following sequence of events. An individual ("Individual-1") entered a white Jeep (the "Jeep") that was parked on Westfield Avenue at approximately 10:43 a.m. At approximately 10:45 a.m., two individuals exited an apartment complex located across the street from where the Jeep was parked. One of those two individuals, whom law enforcement later identified as Kevin Cordeiro ("CORDEIRO"),¹ fired approximately eight gunshots toward the Jeep. Individual-1 immediately left the area in the Jeep.

3. Shortly after the shooting, law enforcement recovered eight .45 caliber shell casings from the shooting scene. The shell casings were manufactured outside of New Jersey, and therefore traveled through interstate commerce prior to February 27, 2021.

4. On or about September 16, 2011, CORDEIRO was convicted of second-degree robbery, in violation of N.J.S.A. 2C:15-1, in New Jersey Superior Court, for which he was sentenced to a six-year term of imprisonment.

¹ A detective from the Union County Prosecutor's Office identified CORDEIRO from the video footage based on the detective's familiarity with CORDEIRO from a prior investigation.